

STEPHEN J. ERIGERO (NV BAR NO. 11562)
TIMOTHY J. LEPORE (NV BAR NO. 13908)
ROPER MAJESKI PC
3753 Howard Hughes Pkwy, Suite 200
Las Vegas, NV 89169
Telephone: 702.954.8300
Facsimile: 213.312.2001
Email: stephen.erigero@ropers.com
timothy.lepore@ropers.com

Attorneys for Plaintiff
AMGUARD INSURANCE COMPANY

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

AMGUARD INSURANCE COMPANY,

Plaintiff,

V.

FRANK CHRISTIAN SIDORIS, an individual;
ALEXANDRIA GOMEZ, an individual;
VICTOR MANUEL AGUILERA, an
individual; PRIMO'S AUTO REPAIR LLC, a
Nevada limited liability company; DOES 1
through 10; and ROES 10 through 20,
inclusive,

Defendants.

Case No. 2:23-cv-00965-RFB-DJA

Hon. Richard F. Boulware

**STIPULATION AND REQUEST FOR
ORDER EXTENDING TIME FOR
DEFENDANT PRIMO'S AUTO
REPAIR LLC TO RESPOND TO
PLAINTIFF AMGUARD INSURANCE
COMPANY'S COMPLAINT**

(FIRST REQUEST)

Complaint Filed: June 22, 2023

Defendant Primo's Auto Repair LLC ("Primo") and Plaintiff AmGUARD Insurance Company ("AmGUARD"), by and through their respective attorneys of record, stipulate and agree to extend the deadline for Primo to file a responsive pleading to AmGUARD's Complaint for Declaratory Relief [ECF No. 1] to September 30, 2023.

On or about August 14, 2023, Primo, by and through its counsel, Lawrence Mittin of Craig P. Kenny & Associates, was served with a copy of the Complaint and Summons. As such, the current deadline for Primo to respond to the Complaint is September 4, 2023. In an effort to streamline this litigation, Primo and AmGUARD have agreed to an extension of time for Primo to respond to the Complaint to negotiate an agreement that would potentially result in the dismissal

1 of Primo from this action without prejudice. As such, this stipulation is submitted in good faith
2 and not for purposes of delay.

3 Accordingly, Primo and AmGUARD hereby stipulate to extend the deadline for Primo to
4 respond to this Complaint to Friday, September 30, 2023.

5 Dated: August 14, 2023

ROPER MAJESKI PC

6
7 By: /s/ Timothy J. Lepore
8 TIMOTHY J. LEPORE (SBN 13908)
9 STEPHEN J. ERIGERO
10 Attorneys for Plaintiff
11 AMGUARD INSURANCE COMPANY

12 Dated: August 14, 2023

13 CRAIG P. KENNY & ASSOCIATES

14 By: /s/ Lawrence Mittin
15 LAWRENCE MITTIN (5428)
16 Attorneys for Defendant
17 PRIMO'S AUTO REPAIR LLC

18 IT IS SO ORDERED this 16th day of August 2023.

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20 
21 DANIEL J. ALBREGTS
22 UNITED STATES MAGISTRATE JUDGE

23
24 DATED: August 16, 2023
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CERTIFICATE OF SERVICE

Pursuant to NEFCR 9 and LR IC 4-1 (b), I hereby certify that I am an employee of Ropers Majeski PC and that on the 15th day of August, 2023, I served a true and correct copy of the foregoing **STIPULATION AND REQUEST FOR ORDER EXTENDING TIME FOR DEFENDANT PRIMO'S AUTO REPAIR LLC TO RESPOND TO PLAINTIFF AMGUARD INSURANCE COMPANY'S COMPLAINT** via the Court's electronic filing and service system to all parties on the court's current service list.

/s/ Alisa Hayslett

An Employee of Ropers Majeski PC

ROPER'S

M A J E S K I

A Professional Corporation
Las Vegas

From: [Lawrence Mittin](#)
To: [Lepore, Timothy J.](#)
Cc: [Hayslett, Alisa](#); [Erigero, Stephen J.](#)
Subject: RE: File #BHSI 0109V, Primo's Auto and AmGUARD
Date: Monday, August 14, 2023 3:45:43 PM

Hi. You can e-sign the Stip and file. Thank you, Larry

From: Lepore, Timothy J. <timothy.lepore@ropers.com>
Sent: Monday, August 14, 2023 2:50 PM
To: Lawrence Mittin <lmittin@cpklaw.com>
Cc: Hayslett, Alisa <alisa.hayslett@ropers.com>; Erigero, Stephen J. <stephen.erigero@ropers.com>
Subject: RE: File #BHSI 0109V, Primo's Auto and AmGUARD

Larry,

Following up on my correspondence below, I'm attaching the following documents to accomplish service on Primo's Auto Repair, LLC: the Complaint, Summons, Civil Cover Sheet, and Certificate of Interested Parties.

Further, in accordance with our correspondence below, I'm attaching a copy of the proposed stipulation and order to extend the deadline for Primo to respond to the Complaint. I've extended the deadline from September 4th to September 30th, which should provide enough time to work out a stipulation to bind Primo by the Court's coverage determination and to dismiss Primo from this lawsuit.

Please advise if you have any requested edits to the proposed stipulation. If not, please confirm that we may affix your electronic signature to it.

Thank you,

Timothy J. Lepore
Partner
ROPERS MAJESKI PC
(702) 954-8310

From: Lawrence Mittin <lmittin@cpklaw.com>
Sent: Wednesday, August 9, 2023 12:22 PM
To: Lepore, Timothy J. <timothy.lepore@ropers.com>; jag@mgalaw.com
Cc: Erigero, Stephen J. <stephen.erigero@ropers.com>; Hayslett, Alisa <alisa.hayslett@ropers.com>
Subject: RE: File #BHSI 0109V, Primo's Auto and AmGUARD

Thanks, Larry

From: Lepore, Timothy J. <timothy.lepore@ropers.com>
Sent: Wednesday, August 9, 2023 11:18 AM